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**COUNTY OF RIVERSIDE**  
**TRANSPORTATION AND LAND MANAGEMENT**  
**AGENCY**

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January 16, 2007

Dale Hoffman-Floerke  
Salton Sea PEIR Comments  
Department of Water Resources  
Colorado River and Salton Sea Office  
1416 Ninth Street, Room 1148-6  
Sacramento, CA 95814

**RE: Draft Programmatic Environmental Impact Report for the Salton Sea Ecosystem  
Restoration Program**

Dear Mr. Hoffman-Floerke,

Thank you for providing the County of Riverside Planning Department the opportunity to review and comment on the Draft Programmatic Environmental Impact Report (PEIR) for the Salton Sea Ecosystem Restoration Program (hereafter "Project").

**Background:**

The Salton Sea Ecosystem is one of the most important wetlands for birds in North America and supports some of the highest levels of avian biodiversity in the southwestern United States. The Salton Sea provides habitat for both resident and migratory birds which include a number of threatened, endangered, and species of concern. Historically, the Salton Sea also presented an abundant source for recreational marine sport fishing until increasing salinity levels and declining water quality resulted in eliminating the marine fish species. Presently, further exacerbating the water quality issues, are the diminishing inflows from the Colorado River as a result of apportionment of adjudicated water rights of users of Colorado River water (Quantification Settlement Agreement (QSA)).

The importance of the Salton Sea Ecosystem and its connection as part of a larger ecosystem and socio-economic region is recognized under State and federal law. Legislation has been passed to restore the Salton Sea Ecosystem and to protect surrounding economic and social (i.e., recreational, aesthetic, scientific, commercial) values of wildlife. The legislation requires implementation of conservation measures necessary to protect fish and wildlife dependent on the Sea, but includes the Salton Sea, lower Colorado River and Colorado River Delta in the conservation area. The Legislature included the term "ecosystem" intentionally, to ensure that restoration planning did not address the Sea in isolation since many of the species dependent on the Sea also rely on the surrounding agricultural land and many of the activities in areas surrounding the Sea affect the habitat value of the Sea itself.

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### **Environmental Review:**

As mandated, the California Resources Agency commenced a study and developed alternatives for implementing the Project consist with guidelines set by legislation. The Draft PEIR defines the Study Area to include the Salton Sea, surrounding agricultural lands and tributaries and drains within the Imperial and Coachella valleys which feed into the lake. Eight alternatives, incorporating partial sea and shallow saline habitat concepts, are presented in the Draft PEIR for the reviewer's evaluation and comparison. The purpose of evaluating the alternatives is not to determine an environmentally superior project but to select a "preferred alternative" for restoration of the Salton Sea Ecosystem and permanent protection of wildlife dependent on that ecosystem. The primary objectives of the "preferred alternative" are to:

- Restore long-term aquatic and shoreline habitat
- Eliminate air quality impacts resulting from restoration
- Protect water quality

Each alternative is described and compared to existing conditions as a basis for analysis. Additionally, two No Action Alternative scenarios are presented and described as:

- N/A – CEQA alternative, which is based on existing conditions without the project projected over a 75-year period and considers projects previously defined in environmental documentation by other agencies/jurisdictions (i.e., implementation of the QSA, reductions in inflows from Mexico, groundwater management activities in the Coachella Valley, etc.); and,
- N/A – Variable Conditions alternative, which is also based on existing conditions without the project but considers a wider range of variables such as a conservative projection of changes in inflows over a 75-year period (i.e., changes in agricultural practices, further reductions of inflows from Mexico, delayed implementation of groundwater management in the Coachella Valley, etc.).

The partial sea and shallow saline habitat concepts are further broken into project components which at some level will help to achieve the objectives of the Project. All eight alternatives include one or more of the following components:

1. Saline Habitat Complex (cells with water depth less than six feet)
2. Deep Marine Sea (water depth could exceed 50 feet, habitat would be similar to historic conditions)
3. Moderately Deep Marine Sea (water depth could extend to 10 feet)
4. Air Quality Management (combination of exposed playa, utilization of water efficient vegetation or brine stabilization)
5. Desert Pupfish Connectivity (included in all alternatives)
6. Brine Sink (included in all alternatives)
7. Freshwater Reservoir (included in one alternative)

Due to the nature of the Draft PEIR, Planning staff's comments are restricted to impacts which may result from implementation of an alternative and the adequacy of proposed mitigation measures:

1. Under each alternative, the Draft PEIR should clearly identify to what extent habitat restoration meets the objectives of the guidelines established by State and federal law. For example, if the deep marine sea concept is included in an alternative, does it

actually benefit the Lake's ecosystem by maintaining fish levels? There appears to be some question as to water depth and fish sustainability.

2. Prior to implementation of any alternative, it seems prudent that a comprehensive air quality management plan should be developed which specifically addresses fugitive dust impacts during construction and operation of the restoration. What the Draft PEIR includes is largely based on future studies and/or monitoring which is not considered adequate mitigation under CEQA. Effective air quality mitigation measures and implementation along with associated costs should be identified in the Draft PEIR since eliminating air quality impacts is one of the primary objectives of the Project. This comprehensive plan could serve as an umbrella for mitigating air quality impacts resulting from subsequent projects.
3. The Draft PEIR does not adequately evaluate growth-inducing impacts resulting from the restoration of such a significant recreational resource. The proposed recreational opportunities (i.e., boating, water skiing, bird watching, hiking, hunting, biking, swimming, camping, fishing and other day use activities) under the alternatives will create the need to provide proximate appurtenant and supporting facilities. This eco-tourism will result in economic growth and revitalization of surrounding areas and needs to be considered in the analysis.
4. All alternatives proposed under the Project involve diluting the existing sea water to reduce salinity levels. The Brine Sink will collect the salt concentrations until it becomes necessary to manually dispose of said concentrations. The Draft PEIR needs to address the disposal method and location.
5. Much of the Lake's shoreline is currently protected through local habitat plans and/or by State and federal authorities. The Draft PEIR should identify that although some areas are privately owned, development may not be feasible due to these plans and/or land use constraints (i.e., 100-year flood hazard zone, Alquist-Priolo Special Studies Fault Zone, etc.).
6. Under Land Use, the Draft PEIR should address Riverside County's Land Use Designations. Specifically, a large part of land uses in the Oasis area are designated as Community Development. These uses could presumably benefit from, or be impacted by, the Salton Sea alternatives. Also, in the North Shore area, the document needs to address that restoration of the Lake could potentially lead to development of the area. Impacts of this development, beneficial or otherwise, need to be fully evaluated in the Draft PEIR.
7. Additionally, the Riverside County General Plan identifies several scenic highways and a number of Class I Bike Paths/Regional Trails in proximity of the Lake. Impacts resulting from restoration, construction and operation, needs to be addressed and mitigated under Aesthetics and Recreational Resources.
8. The Draft PEIR should clearly identify and evaluate the impacts of motorized boats on resident and migratory fowl.
9. The EIR identifies that a project-level traffic study will be conducted in the future, probably at the time one alternative is selected, which is appropriate. We recommend that the following be included in the "Next Steps" section in Chapter 20-21:

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- a. That the future Traffic Study identify not only needed capacity improvements based on level of service, but also any needed safety and operational improvements (such as turn lanes and pavement widening to provide adequate truck turning radii) to accommodate the construction traffic once the locations of the borrow sites are known.
- b. That a before-and-after pavement study be conducted of the County roads that will carry the truck traffic, and that the project be required to bond for and construct any pavement repairs caused by the extensive truck traffic.
- c. That a Traffic Management Plan be prepared that can be reviewed and approved by the County and other impacted jurisdictions which will address construction traffic routing, needed levels of traffic control, and the other measures identified in this section.

Riverside County is in support of an alternative that minimizes exposed playa in the north sea and would thereby minimize air quality impacts to the residents of Riverside County.

Riverside County is in full support of the Salton Sea Authority's Plan for the Salton Sea Restoration Project, included in the PEIR as Alternative 7. Riverside County believes that the Secretary for Resources is obligated to choose a plan that results in a robust sea that maximizes not only wildlife habitat, water quality improvements and air quality, but also opportunities for recreation and economic development. We believe that Alternative 7 meets these objectives more fully than any other alternative presented in the PEIR.

If you should have any questions regarding these comments, please contact Kathleen Browne at (951) 955-4949.

Sincerely,

RIVERSIDE COUNTY PLANNING DEPARTMENT  
Ron Goldman, Interim Planning Director

  
Kathleen Browne, Special Projects

cc: Supervisor Roy Wilson, 1<sup>st</sup> District  
Tony Carstens, TLMA Director  
Dan Martinez, Deputy County Executive Office  
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